

**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

CRH/JMH/EHS  
F. #2017R00906

271 Cadman Plaza East  
Brooklyn, New York 11201

November 2, 2021

By Email and USAFx

Kevin K. Tung  
c/o Kevin Kerveng Tung PC  
136-20 38th Avenue, Suite 3D  
Flushing, New York 11354

Re: United States v. Yong Zhu  
Criminal Docket No. 21-265 (PKC)

Dear Counsel:

Enclosed please find the following additional discovery in accordance with the government's discovery obligations:

Description	Begin Bates	End Bates
China Daily webpage	YZ-002458	YZ-002458
SMS and MMS messages	YZ-002459	YZ-002475
Cathay Bank records	YZ-002476	YZ-002508
Citibank records	YZ-002509	YZ-002713
Discover Bank records	YZ-002714	YZ-003099
Discover Bank records	YZ-003100	YZ-003202
Equifax records	YZ-003203	YZ-003212

<b>Description</b>	<b>Begin Bates</b>	<b>End Bates</b>
GTA records	YZ-003213	YZ-003306
Guam Department of Revenue and Taxation records	YZ-003307	YZ-003313
JP Morgan Chase & Co. records	YZ-003314	YZ-003926
JP Morgan Chase & Co. records	YZ-003927	YZ-004161
Lycamobile records	YZ-004162	YZ-004162
New York State Department of Motor Vehicle records	YZ-004163	YZ-004187
Pinger records	YZ-004188	YZ-004191
Law enforcement records associated with Yong Zhu	YZ-004192	YZ-004201
Electronic Messages and Draft Translation	YZ-004209	YZ-004225
uShip records	YZ-004226	YZ-004273 & YZ-004326
FBI Laboratory Report	YZ-004274	YZ-004280
FBI Laboratory Report	YZ-004281	YZ-004286
Facebook records	YZ-004287	YZ-004289
Electronic Messages and Draft Translation	YZ-004288	YZ-004288
Electronic Messages and Draft Translation	YZ-004289	YZ-004289
Electronic Messages and Draft Translation	YZ-004290	YZ-004290

<b>Description</b>	<b>Begin Bates</b>	<b>End Bates</b>
Electronic Messages and Draft Translation	YZ-004291	YZ-004291
Electronic Messages and Draft Translation	YZ-004292	YZ-004292
Electronic Messages and Draft Translation	YZ-004293	YZ-004293
Electronic Messages and Draft Translation	YZ-004294	YZ-004294
Yahoo! records	YZ-004295	YZ-004295
Yahoo! records	YZ-004296	YZ-004296
Apple records	YZ-004297	YZ-004297
Google records	YZ-004298	YZ-004298
T-Mobile records	YZ-004299	YZ-004299
Electronic communications associated with Michael McMahon	YZ-004300	YZ-004300
Apple records	YZ-004302	YZ-004305
Capital One Bank records	YZ-004306	YZ-004306
AT&T records and data	YZ-004307	YZ-004307
eBay records	YZ-004308	YZ-004308
Paypal records	YZ-004309	YZ-004309
Google records	YZ-004310	YZ-004310

<b>Description</b>	<b>Begin Bates</b>	<b>End Bates</b>
Google records	YZ-004311	YZ-004311
Lycamobile records	YZ-004312	YZ-004312
Microsoft records	YZ-004313	YZ-004313
Scottrade records	YZ-004314	YZ-004314
T-Mobile records	YZ-004315	YZ-004315
T-Mobile records	YZ-004316	YZ-004316
T-Mobile records	YZ-004317	YZ-004317
Photographs and video	YZ-004318	YZ-004318
Yahoo records	YZ-004319	YZ-004319
Yahoo records	YZ-004320	YZ-004320
T-Mobile records	YZ-004321	YZ-004321
T-Mobile records	YZ-004322	YZ-004322
Verizon records	YZ-004323	YZ-004323
Audio recording	YZ-004325	YZ-004325

The materials are being provided subject to the protective order agreed to by the parties and entered by the Court on June 18, 2021. See ECF No. 70 (“the Protective Order”). The government considers certain of the materials produced today to constitute “sensitive discovery material” as that term is defined in the Protective Order, and has identified such

materials accordingly. See Protective Order ¶¶ 7-9.”). The government reiterates its request for reciprocal discovery from the defendant.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Craig R. Heeren  
Craig R. Heeren  
J. Matthew Haggans  
Ellen H. Sise  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures (via USAFx)

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)